

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al	:
	:
Plaintiffs,	:
	:
	04 CV 397(GBD)
v.	:
	:
THE PALESTINE LIBERATION	:
ORGANIZATION, et al.	:
	:
Defendants.	:
	:

---

DEFENDANTS MOTION FOR AN ENLARGEMENT  
OF THE TIME FOR THEIR RESPONSE TO THE  
FIRST AMENDED COMPLAINT

Defendants Palestinian Authority and Palestine Liberation Organization respectfully move for an enlargement of their time to respond to the First Amended Complaint to and including July 31, 2005, and in support of this motion state as follows.

1. This is an action under the Anti-Terrorism Act of 1991, 18 U.S.C. §2331, et seq., to recover damages against defendants Palestinian Authority and Palestine Liberation Organization for deaths and injuries alleged to have occurred in the course of the Israeli-Palestinian conflict.
2. The original complaint was filed on January 16, 2004. Before defendants filed a response, plaintiffs announced their intention to amend the complaint. The defendants accordingly waited for the amended complaint to be filed and did not file a response to the original complaint.
3. The case was then inactive for an extraordinary length of time, until plaintiffs filed the First Amended Complaint on May 23, 2005.

4. The First Amended Complaint is an expanded omnibus pleading. There are now more than 40 plaintiffs asserting claims for damages based on at least seven separate alleged incidents of violence in 2001, 2002 and 2004 in or near Jerusalem.

5. Plaintiffs have refused to agree to the additional time defendants are requesting for their response. However in view of plaintiffs lengthy delay in amending their complaint and the complaint's expanded omnibus nature, encompassing many seemingly unrelated plaintiffs and claims, plaintiffs cannot plausibly assert there is any urgency to their case or that the time being requested by defendants for their response to the First Amended Complaint will be prejudicial.

6. The time defendants are requesting for their response to plaintiffs omnibus complaint is reasonably necessary. Defendants motion for an enlargement of their time to respond to the First Amended Complaint to July 31, 2005 should be granted.

Dated: June 29, 2005

Respectfully submitted,

Ramsey Clark (RC-8261)  
Lawrence W. Schilling (LWS-4835)  
37 West 12<sup>th</sup> Street  
New York, NY 10010  
212-989-6613  
212-979-1583-FAX

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al	:	
	:	
Plaintiffs,	:	
	:	04 CV 397(GBD)
v.	:	
	:	
THE PALESTINE LIBERATION	:	
ORGANIZATION, et al.	:	
	:	
Defendants.	:	
	:	

---

CERTIFICATE OF SERVICE

I certify that defendants motion for an enlargement of the time for their response to the First Amended Complaint was mailed by first class mail and faxed on June 29, 2005, to plaintiffs attorneys as follows:

Lee Squitieri  
32 East 57<sup>th</sup> Street  
12<sup>th</sup> Floor  
New York, NY 10022  
Fax No. (212) 421-6553

David Strachman  
McIntyre, Tate, Lynch & Holt  
321 South Main Street  
Suite 400  
Providence, Rhode Island 02903  
Fax No. (401) 331-6095

---

Ben Chaney